

Moreover, the trench described by *Pan* does not encircle a passive element. (see *Pan* Figs. 2C – 2I). At most, *Pan* describes a plurality of trenches that run along the sides of conductive elements (102, 103, 104).

Independent claim 24 distinguishes over *Pan* for at least the same reasons set forth above with respect to independent claim 13.

In view of these remarks and amendments, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested.

Respectfully requested,

Date:

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